

1 Robert Stempler, Cal. Bar No. 160299
2 Email: Robert@StopCollectionHarassment.com
3 CONSUMER LAW OFFICE OF
4 ROBERT STEMLER, APC
P.O. Box 7145
Oxnard, CA 93031-7145
Telephone (805) 246-2300
Fax: (805) 576-7800

O. Randolph Bragg, Attorney Admitted *Pro Hac Vice*
Email: rand@horwitzlaw.com
HORWITZ, HORWITZ & ASSOCIATES
25 East Washington Street, Suite 900
Chicago, Illinois 60602
Telephone (312) 372-8822
Facsimile (312) 372-1673

10 || Counsel for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

15 POVILAS KARCAUSKAS,
16 on behalf of himself and all
others similarly situated.

17 Plaintiff.

18 || VS.

19 REGRESO FINANCIAL
20 SERVICES LLC;
GOLDSMITH & HULL, APC;
WILLIAM I. GOLDSMITH;

Defendants.

Case No. 2:15-cv-09225-FMO-RAOx

**DISCOVERY MATTER:
NOTICE OF MOTION AND MOTION TO
COMPEL FURTHER RESPONSES AND
DOCUMENT PRODUCTION FROM
WILLIAM I. GOLDSMITH TO (1)
INTERROGATORIES; (2) REQUESTS
FOR ADMISSION; AND (3) REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Date: October 26, 2016

Date: October 26
Time: 10:00 a.m.

Judicial Ofcr: Rozella A. Oliver, M.J.
Courtroom F, Room 901
Los Angeles Federal Courthouse
312 N. Spring St., 9th Floor

Discovery Cutoff Date: 12/07/2016
Class Cert. Motion Deadline: 04/20/2017
Pretrial Conference & Trial Date: Not set.

[Filed concurrently with Joint Stipulation]

28 | //

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on the date and time noted in the caption above,
3 or as soon thereafter as the matter may be heard, in Courtroom F, Room 901, of this
4 Court, inside the Los Angeles Federal Courthouse, addressed at 312 N. Spring Street,
5 Los Angeles, CA 90012, the plaintiff will move for an order to compel WILLIAM I.
6 GOLDSMITH [“responding party”] to comply with Plaintiff’s written discovery
7 requests consisting of: (1) interrogatories, (2) requests for admission, and (3) requests
8 for production of documents.

9 Plaintiff also seeks an award of attorney’s fees, pursuant to rule 37(a)(5) of the
10 Federal Rules of Civil Procedure, against the responding party and its counsel.

11 The application will be made pursuant to rule 37 of the Federal Rules of Civil
12 Procedure and Local Rule 37 et seq.

13 The application will be based on this notice, on the concurrently filed Joint
14 Stipulation, including concurrently filed exhibits, on the supplemental brief which
15 Plaintiff intends to file, and on such evidence as may be filed or presented at any
16 hearings on the matter, including supplemental declarations if the court determines
17 to award expenses and attorney’s fees against the responding party and/or its counsel.

18
19 Dated: October 5, 2016

20 HORWITZ, HORWITZ & ASSOC.

21 CONSUMER LAW OFFICE OF
22 ROBERT STEMPLER, APC

23 /s/
24 By: Robert Stempler,
25 Co-Counsel for Plaintiff and
26 Moving/Requesting Party
27
28